

4. Environmental Analysis

4.2 TRANSPORTATION

This section of the Draft SEIR evaluates the potential transportation impacts of the proposed Project compared to the transportation impacts of the General Plan EIR.

4.2.1 Environmental Setting

4.2.1.1 REGULATORY BACKGROUND

Federal

Surface Transportation Assistance Act (STAA)

The federal government passed the STAA in 1982. STAA requires states to allow larger trucks on the “national network,” which is comprised of the interstate system plus the non-interstate federal-aid primary system. “Larger trucks” include (1) doubles with 28.5-foot trailers, (2) singles with 48-foot semi-trailers and unlimited kingpin-to-rear axle distance, (3) unlimited length for both vehicle combinations, and (4) widths up to 102 inches. I-5 and SR-78 are defined as STAA routes.

State

California Department of Transportation (Caltrans)

Caltrans is the primary state agency responsible for transportation issues. One of its duties is the construction and maintenance of the state highway system. Caltrans has established standards for street traffic flow and has developed procedures to determine if intersections require improvements. For projects that may physically affect facilities under its jurisdiction, Caltrans requires encroachment permits before any construction work may be undertaken. For projects that would not physically affect facilities, but may influence traffic flow and levels of services at such facilities, Caltrans may recommend measures to mitigate the traffic impacts of such projects.

California Transportation Commission (CTC)

The CTC consists of nine members appointed by the Governor of California. Responsibilities of the CTC include the programming and allocation of funds for the construction of highway, passenger rail, and transit improvements throughout the state. The CTC is also responsible for adopting the State Transportation Improvement Program and the State Highway Operation and Protection Program.

California Complete Streets Act (AB 1358)

The California Complete Streets Act (AB 1358) of 2008 was signed into law on September 30, 2008. Beginning January 1, 2011, AB 1358 requires circulation element updates to address the transportation system from a multi-modal perspective. The Act indicates that streets, roads, and highways must “meet the needs of all users in a manner suitable to the rural, suburban, or urban context of the general plan.” The Act requires a

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circulation element to plan for all modes of transportation where appropriate, including walking, biking, car travel, and transit.

The Complete Streets Act also requires circulation elements to consider the multiple users of the transportation system, including children, adults, seniors, and the disabled.

Sustainable Communities and Climate Protection Act (SB 375)

The Sustainable Communities and Climate Protection Act, or SB 375, provides incentives for cities and developers to bring housing and jobs closer together and to improve public transit. The goal is to reduce the number and length of automobile commuting trips, helping to meet the statewide targets for reducing GHG emissions by AB 32.

SB 375 requires each Metropolitan Planning Organization to add a broader vision for growth, called a Sustainable Communities Strategy (SCS), to its transportation plan. The SCS must lay out a plan to meet the region's transportation, housing, economic, and environmental needs in a way that enables the area to lower GHG emissions. The SCS should integrate transportation, land use, and housing policies to plan for achievement of the emissions target for their region. The Southern California Association of Governments (SCAG) Regional Transportation Plan (RTP) and SCS were adopted in 2016.

Senate Bill 743 (SB 743)

On December 28, 2018, the California Natural Resources Agency adopted revised State CEQA Guidelines. One revision that the Natural Resources Agency made to the State CEQA Guidelines was to add language regarding how lead agencies should determine the significance of transportation impacts. Specifically, According to State CEQA Guidelines, section 15064.3, generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts. Lead agencies can opt into the revised transportation guidelines now, but the new guidelines must be used starting July 1, 2020. Once adopted, "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment" (Public Resources Code Section 21099(b)(2)). The City has not adopted revised traffic impact analysis guidelines. The SB 743 Legislation does not preclude the application of local general plan policies, zoning codes, conditions of approval, or any other planning requirements that require evaluation of LOS, but starting July 1, 2020, these metrics may no longer constitute the sole basis for determining transportation impacts under CEQA.

Regional

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is a regional council of governments representing Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties, which encompass over 38,000 square miles. SCAG is the federally recognized metropolitan planning organization (MPO) for this region and a forum for addressing regional issues concerning transportation, the economy, community development, and the environment. SCAG is also the regional clearinghouse for projects requiring environmental documentation under federal and state law. In this role, SCAG reviews proposed

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development and infrastructure projects to analyze their impacts on regional planning programs. As the southern California region's MPO, SCAG cooperates with the South Coast Air Quality Management District, the California Department of Transportation, and other agencies in preparing regional planning documents. The City of Redlands is within the San Bernardino Council of Governments sub-region of SCAG.

2016 Regional Transportation Plan / Sustainable Communities Strategy

The 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) was adopted in April 2016. Major themes in the 2016 RTP/SCS include integrating strategies for land use and transportation; striving for sustainability; protecting and preserving existing transportation infrastructure; increase capacity through improved systems management; providing more transportation choices; leveraging technology; responding to demographic and housing market changes; supporting commerce, economic growth and opportunity; promoting the links between public health, environmental protection and economic opportunity; and incorporating the principles of social equity and environmental justice into the plan.

The SCS outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce GHG emissions from transportation (excluding goods movement). The SCS is meant to provide growth strategies that would achieve the regional GHG emissions reduction targets identified by the California Air Resources Board. However, the SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS; instead, it provides incentives to governments and developers for consistency.

San Bernardino Congestion Management Plan (CMP)

The CMP was enacted by Proposition 111, passed by voters in 1990, to address the increasing public concern that traffic congestion is impacting the quality of life and economic vitality of the State of California. The intent of the CMP is to provide the analytical basis for transportation decisions through the Statewide Transportation Improvement Program (STIP) process, a multi-year capital improvement program for transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other funding sources.

The San Bernardino County CMP, published and periodically updated by SANBAG, defines a network of state highways and arterials in the County and provides guidelines regarding level of service standards, impact criteria, and a process for mitigation of impacts on CMP facilities in the County. The minimum acceptable level of service (LOS) for CMP facilities is LOS E, with certain exceptions. The 2016 Congestion Management Program was updated in June 2016.

Local

Measure U

Voters in the City of Redlands passed Measure U in 1997. Principle 6 of the Measure states:

- a) Levels of Traffic Service throughout the City Shall be Maintained – To assure the adequacy of various public services and to prevent degradation of the quality of life experienced by

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the citizens of Redlands, all new development projects shall assure by appropriate mitigation measures that, at a minimum, traffic levels of service are maintained at a minimum of LOS C throughout the City, except where the current level of service (LOS) is lower than LOS C, or as provided in Section 5.20 of the Redlands General Plan where a more intense LOS is specifically permitted. In any location where the LOS is below C at the time an application for development project is submitted, mitigation measures shall be imposed on that development project to assure, at a minimum, that the level of traffic service is maintained at levels of service that are no worse than those existing at the time an application for development is filed, except as provided in Section 5.20b.

- b) Collector and Local Street Standards Shall be Maintained – No development project shall be approved which will generate traffic volume on residential collector streets or local residential streets in excess of the standards set forth in the Redlands General Plan at Sections 5.32a and 5.32b. Roadways shall be designed and designated for use in accordance with the standards set forth in GP Figure 5.3 of the Redlands General Plan.

Certain categories of development are exempt from the requirements of Measure U as listed in Section 2, B. For the non-exempt categories of development, there is little flexibility in modifications to the existing LOS policy.

City of Redlands Bicycle Master Plan

The City of Redlands Bicycle Master Plan which was adopted in 2015 outlines an extensive network with over one hundred additional miles of bicycle facilities (over two hundred lane miles). The City of Redlands Bicycle Master Plan provides a vision for improving the bicycling environment by providing direction for the expansion of the existing bikeway network, connection of gaps, recommendations for bicycle support facilities, and education and awareness programs. The implementation of facilities and programs identified in the Bicycle Master Plan will create a bicycle-friendly environment, and thereby encourage residents and visitors to bike more frequently, which will subsequently lower GHG and create a healthier environment for residents and visitors.

4.2.1.2 EXISTING CONDITIONS

Motor Vehicle Circulation

Motor Vehicle Facilities

Motor vehicles in the 2035 General Plan Area are accommodated by a number of facilities, due in part to its location at the confluence of two major regional freeway facilities, Interstate 10 (I-10) and Interstate 210 (I-210).

Freeways

Freeways are high-speed facilities that serve intercity or regional traffic, with access generally limited to grade-separated interchanges. Highways are also higher-speed, regional facilities, but access is provided at-grade in most cases. The freeways through Redlands are I-10 and I-210.

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Arterial Roadways

Arterial streets provide accessibility between major activities centers and residential areas, as well as connectivity to freeways. Most arterials also serve as truck routes. State Route 38 (SR-38) (Lugonia Avenue, Mill Creek Road), Alabama Street, Redlands Boulevard, California Street, and Brookside Avenue are arterial roadways within the 2035 General Plan Area.

Major arterial roadways typically provide four to six travel lanes. They usually provide service for the highest volumes and the longest trips and are reasonably higher-speed routes. Minor arterial roadways enhance the major arterial network and are typically two to four travel lanes. They provide service to trips of moderate lengths.

Collector Streets

Collector streets link residential and commercial areas to each other and to the arterial street system. Two travel lanes are typically provided on collector streets, and the maximum acceptable volumes may be based on neighborhood concerns rather than traffic capacity.

Local Streets

Local streets accommodate low volumes of local traffic and primarily provide access to individual parcels. Local streets typically have two travel lanes (one in each direction) and allow parking on both sides. Through traffic is generally discouraged.

Signalized Intersections

There are 93 signalized intersections within the Redlands city limits, as shown in Figure 3.15-2, *Signalized Intersections*, of the General Plan EIR. The City of Redlands operates and maintains 68 of the traffic signals; the remainder are owned by either Caltrans or the County.

Motor Vehicle Level of Service

Methodology

As the General Plan EIR evaluated full buildout of the 2035 General Plan, this Draft SEIR evaluates the potential unit yield that could result with approval of the proposed Project. If the proposed Project is approved, the City could approve multiple family residential development at 27 units per acre without a 4/5ths vote of the Council. As shown in Table 4.2-1, the proposed Project could generate approximately 930 daily trips, or roughly 62/75 AM/PM peak hour trips respectively. These trips were compared to the analysis in the General Plan EIR to determine if the proposed Project would change the conclusions of the analysis. For purposes of this Draft SEIR these units are considered “new” even though the General Plan EIR evaluated buildout at the maximum 27 units per acre, and the units could be approved currently with a 4/5ths vote.

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Table 4.2-1 Trip Generation With and Without 4/5ths Vote

Land Use	Units		Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Rates									
Multifamily Housing (Mid-Rise) ¹		DU	5.440	0.094	0.266	0.360	0.268	0.172	0.440
Project Trip Generation									
Existing Yield (Current TVPA) With 4/5 Vote	343	DU	1866	32	91	123	92	59	151
Proposed Project Without 4/5 Vote	514	DU	2796	48	137	185	138	88	226
Allowed with Simple Majority	171	DU	930	16	46	62	46	29	75
DU = Dwelling Unit									
¹ Trip rates from the Institute of Transportation Engineers, <i>Trip Generation, 10th Edition, 2017</i> . Land Use Code 221 - Multifamily Housing (Mid-Rise).									

4.2.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- T-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.
- T-2.a Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.
- T-2.b Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b). (VMT)
- T-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
- T-4 Result in inadequate emergency access.

Threshold T-2.a is the threshold that was analyzed on the General Plan EIR, under the previous version of Appendix G of the CEQA Guidelines. As of 2019, the Appendix G checklist of the CEQA Guidelines was updated, and Threshold T-2.b replace T-2.a. This Draft SEIR analyzes both thresholds.

As no development is proposed by the Project, and none of the growth management policies affect design requirements for safety and access, there is no impact to thresholds T-3 and T-4, and they are not discussed further in this section, but are included in Chapter 5 of the Draft SEIR.

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4.2.3 Summary of Impacts Associated with the General Plan EIR

Implementation of the 2035 General Plan is anticipated to increase traffic volumes on the study intersections, roadway segments and freeway segments. For purposes of determining the significance of impacts, the impact analysis of the General Plan EIR compared the 2035 General Plan in year 2035 to existing conditions in year 2015.

- Within the cities of Redlands and Loma Linda, none of the study intersection or roadway segment levels of service are forecast to degrade from acceptable LOS C or worsen at a facility currently operating unacceptably. Based on Caltrans significance criteria, the 2035 General Plan would result in a significant and unavoidable impact by adding traffic to deficient facilities at two intersections, two roadway segments, and four freeway segments. Based on County of San Bernardino significance criteria, the 2035 General Plan would result in a significant and unavoidable impact by worsening LOS at deficient facilities at two intersections (Intersections of Alabama Street and Lugonia Avenue, and Orange Street and Lugonia Avenue) and one roadway segment (Alabama Street – Palmetto Avenue and Pioneer Avenue). Based on County of San Bernardino significance criteria, the 2035 General Plan would result in a significant and unavoidable impact by worsening LOS at deficient facilities at the Alabama Street from Palmetto Avenue and Pioneer Avenue intersection.
- Without the implementation of the roadway improvement policies of the 2035 General Plan, one of the CMP study roadway segment’s LOS worsens at a facility already operating at LOS F, which results in a significant and unavoidable impact.

The 2035 General Plan would result in less than significant impacts according to Criteria 3, 4 and 5. For Criterion 3, the proposed General Plan would not result in a change in air traffic patterns. For Criterion 4, the proposed General Plan would not result in inadequate emergency access. Lastly, for Criterion 5, the 2035 General Plan would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities.

4.2.4 Environmental Impacts of the Proposed Project

Impact 4.2-1: The proposed Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities. [Threshold T-1]

Impacts of the 2035 General Plan on the vehicular network were forecasted for intersection, roadway, and freeway analysis. According to Table 3.15-9, *Future (Year 2035) plus Project Intersection Level of Service*, of the General Plan EIR, the following intersections, which are within the TVPA, would result in traffic levels of service (LOS) of less than “C:” #19 Colton Avenue and Eureka Street, #21 Colton Avenue and University Street, and #22 Colton Avenue and Judson Street in the year 2035. The General Plan EIR states that using the relevant impact criteria, and assuming the implementation of improvements in the 2035 General Plan, none of the intersections would expect significant impacts with the full 2035 General Plan buildout.

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Moreover, Table 3.15-11, *Future (Year 2035) plus Project Roadway Segment Level of Service*, of the General Plan EIR, shows that none of the study roadway segments in 2035 would operate at unacceptable levels of service, assuming full implementation of the 2035 General Plan improvements. Additionally, segment #54 of I-10, from Tennessee Street to Orange Street, would operate at a LOS C or better in 2035, while segment #55 of I-10, from 6th Street to University St, which is within the TVPA would operate at a LOS E in 2035, as shown in Table 3.15-13, *Future (Year 2035) plus Project Freeway Segment Level of Service*, of the General Plan EIR.

The 2035 General Plan includes policies and actions addressing changes in vehicle LOS resulting from buildout. Additionally, the 2035 General Plan includes policies and actions that strengthen and expand the non-motorized transportation system and would not conflict with any established plans, ordinances, or policies establishing measures of effectiveness for these forms of circulation.

Upon implementation of the proposed Project, the requirement for the maintenance of traffic levels of service “C” for all intersections when considering new development, would no longer apply within the TVPA. However, the General Plan EIR indicated that the intersections within the TVPA would not result in significant impacts if improvements are implemented, and, as shown in Table 3.15-11, none of the roadway segments would result in a LOS of less than C. Segment #55 of the I-10 would be the only freeway segment in the TVPA that would result in a LOS of less than C in 2035. Because the freeway system is not within the City of Redland’s jurisdiction, as impacts on the freeway system would occur due to regional growth, regardless of the implementation of the 2035 General Plan, impacts would be significant and unavoidable. The proposed Project would implement the following policies and actions of the General Plan EIR: 5-P.2, 5-P.3, 5-P.5, 5-P.10, 5-P.21, 5-P.23, 5-P.24, 5-A.30, 5-A.32, 5-A.34, 5-A.38, 5-A.39, 5-A.40, 5-A.42, 5-A.43, 5-A.44, 5-A.45, 5-A.46, and 5-A.48. For example, Policy 5-P.10 requires developers to construct or pay their fair share toward improvements for all travel modes consistent with the layered network, which would ensure sufficient funds are allocated for roadway improvements. As indicated on page 3.15-34 of the General Plan EIR, the impacts of the General Plan EIR are significant and unavoidable as eight of the proposed improvements are located on facilities that are partially or fully controlled by other jurisdictions, and the City cannot guarantee implementation. As the proposed Project would not result in new or more significant impacts in this regard, impacts of the General Plan EIR and the proposed Project would be the same.

Impact 4.2-2: Adoption of the General Plan would conflict with an applicable congestion management plan (CMP) including, but not limited to level of service standards and travel demand measures, or standards established by the county congestion management agency for designated roads or highways. [Threshold T-2.a]

Page 3.15-27 of the General Plan EIR, states that the performance criteria used for facilities in the SANBAG San Bernardino County CMP facilities are as follows:

- LOS E is the minimum acceptable level of service
- Projects that degrade LOS E to LOS F, or worsen conditions at facilities already operating at LOS F will result in a significant impact.

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If all the proposed 2035 General Plan improvements were to be implemented, then six CMP intersections and 14 CMP roadway segments within the 2035 General Plan Area would not degrade existing levels of service below acceptable levels or further degrade existing unacceptable level of service. However, as stated on page 3.15-49 of the General Plan EIR, some improvements of the General Plan EIR are partially or fully within the control of other jurisdictions and cannot be guaranteed by the City, and without the proposed improvements, the LOS would worsen at a roadway segment, Alabama Street from Palmetto Avenue and Pioneer Avenue, already operating at LOS F. This would result in a significant and unavoidable impact under the General Plan EIR. However, as this roadway segment is not within the TVPA, and the proposed Project does not increase density or intensity of development beyond what was analyzed in the General plan EIR, impacts of the proposed Project would not result in new or more significant impacts. Moreover, the proposed Project would implement the following policies and actions of the General Plan EIR: 5-P.2, 5-P.3, 5-P.5, 5-P.10, 5-P.21, 5-P.23, 5-P.24, 5-A.30, 5-A.32, 5-A.34, 5-A.38, 5-A.39, 5-A.40, 5-A.42, 5-A.43, 5-A.44, 5-A.45, 5-A.46, and 5-A.48. For example, Action 5-A.46 calls for the avoidance of adding traffic to collector and local streets carrying volumes above capacity, and to consider traffic control measures where volumes exceed the standard and perceived nuisance is severe.

Impact 4.2-3: The proposed Project would not conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b). [Threshold T-2.b]

The proposed Project would remove the requirement for the maintenance of traffic levels of service “C” for all intersections within the TVPA, or for areas where LOS C is already exceeded, assure that it does not degrade as a result of development. Even though, beginning July 1, 2020, the City will generally measure transportation impacts using VMT instead of LOS, LOS remains relevant to the City’s analysis of a subsequent project’s merits because projects must still comply with the Circulation Element of the General Plan that has policies regarding level of service.

The proposed Project would not increase or change the overall land use buildout assumed and analyzed in the General Plan EIR. Therefore, the proposed Project would not affect the projected traffic assumed in the 2035 General Plan and remains consistent with the regional growth forecast. The proposed Project would continue to implement the following policies and actions of the 2035 General Plan as stated in the discussion beginning on page 3.15-57 of the General Plan EIR: 5-P.2, 5-P.3, 5-P.5, 5-P.10, 5-P.21, 5-P.23, 5-P.24, 5-A.30, 5-A.30, 5-A.32, 5-A.34, 5-A.38, 5-A.39, 5-A.40, 5-A.43, 5-A.44, 5-A.45, 5-A.46, and 5-A.48. For example, Action 5-A.46 calls for the avoidance of adding traffic to collector and local streets carrying volumes above capacity and requires consideration of traffic control measures where volumes exceed the standard and perceived nuisance is severe.

The proposed Project is intended to allow the City to consider future projects that would be designed to maximize access to planned transit stops within the TVPA. The expectation is that future residents would use the transit stops in lieu of at least some of the vehicle trips ordinarily associated with development. No physical project or change in land use density is part of the proposed Project. Instead, the proposed Project removes existing impediments to City consideration of transit-oriented design (TOD) features such as higher density, mid-rise buildings, and new general plan designations, within the TVPA. With the combination of

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appropriate project design, oriented around future transit stations, the City anticipates a reduction in VMT as future residents will have more transportation options within the TVPA than currently exist.

As the proposed Project does not provide for more development than currently projected in the 2035 General Plan and analyzed in the General Plan EIR, and as future development can take advantage of currently planned transit routes allowing for a reduction in VMT, the proposed Project is consistent with CEQA Guidelines Section 15064.3, subdivision (b) and with the conclusion in on page 3.15-60 of the General Plan EIR, this impact is less than significant impact.

4.2.5 Cumulative Impacts

While the proposed Project is limited to the TVPA, traffic may have impacts that extend outside of the Project area. As the proposed Project does not increase any land designation or result in the approval of any development, the analysis of the 2035 General Plan contained in the General Plan EIR remains unchanged. Future development requests that may follow the proposed Project would likely be evaluated under both the LOS and VMT standards as the former remains in the General Plan Circulation Element and the latter is the new method for measuring transportation impacts. The City has latitude in considering compliance with the 2035 General Plan.

While not part of the proposed Project, its approval may lead to projects that help realize the vision of the 2035 General Plan as stated in Section 4.5 Transit Villages:

“These are intended as a foundation for realizing the goal of a connected, accessible, and active community by creating pedestrian- and transit-oriented villages that reflect each station area’s existing assets and unique characteristics. Components of the strategy serve to improve connectivity between the proposed Transit Villages and the city’s existing neighborhoods; provide new jobs, housing, and entertainment opportunities in compact, walkable environments; support multiple modes of transit, car travel, walking, and bicycling; and provide new development and infill opportunities as alternatives to building at the edges of the city.”

The General Plan EIR evaluated buildout of the TVPA within a 20-year horizon and as shown in Table 4.2-2, *Future (Year 2035) Plus Project Intersections, Roadway and Freeway Segments Level of Service*, determined that all intersections, and roadway and freeway segments would operate at a LOS of C or better in 2035, except for freeway Segment #55, which would continue to operate at a LOS of E in 2035.

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Table 4.2-2 Future (Year 2035) Plus Project Intersections, Roadway and Freeway Segments Level of Service

INTERSECTIONS									
#	North/South Street	East/West Street	Control	Jurisdiction	Peak Hour	Existing		Future Plus Project	
						Delay	LOS	Delay	LOS
19	Eureka St.	Colton Ave.	Signal ¹	City of Redlands	AM	9.9	A	6.4	A
					PM	43.8	E	11.6	B
21	University St.	Colton Ave.	AWSC	City of Redlands	AM	>50	F	12.8	B
					PM	>50	F	10.6	B
22	Judson St.	Colton Ave.	AWSC	City of Redlands	AM	37.9	E	7.9	A
					PM	15.9	C	7.0	A

ROADWAY SEGMENTS									
#	Roadway	Extent	Classification	Jurisdiction	Capacity	Existing		Future Plus Project	
						ADT	LOS	ADT	LOS
8	Cajon St.	Vine St. and Olive St.	2-Lane Minor Arterial	City of Redlands	16,500/ 18,1003	10,110	C or better	10,500	C or better
12	Church St.	Stuart Ave. and Central Ave.	2-Lane Collector	City of Redlands	16,100	7,222	C or better	7,300	C or better
13	Citrus Ave.	6th St. and Olive St.	2-Lane Minor Arterial	City of Redlands and CMP	16,500/ 18,1003	9,262	C or better	9,500	C or better
19	Eureka St.	North of Redlands Blvd.	4-Lane Minor Arterial	City of Redlands	33,100	14,844	C or better	15,400	C or better
37	Redlands Blvd.	Cypress St. and Palm Ave.	4-Lane Major Arterial	City of Redlands and CMP	33,100/ 36,4003	12,834	C or better	15,900	C or better
44	Tennessee St.	I-10 and Colton Ave.	4-Lane Minor Arterial	City of Redlands ²	33,100/ 36,4003	22,322	C or better	25,200	C or better
45	Tennessee St.	State St. and Orange St.	4-Lane Minor Arterial	City of Redlands	33,100/ 36,4003	12,725	C or better	12,800	C or better

FREEWAY SEGMENTS									
#	Freeway	Extent	Classification	Capacity	Existing		Future Plus Project		
					ADT	LOS	ADT	LOS	
54	I-10	Tennessee St. to Orange St.	10-Lane Freeway	161,100/ 201,400	104,000	C or better	126,100	C or better	
55	I-10	6th St. to University St.	10-Lane Freeway	161,100/ 201,400	157,000	E	181,900	E	

Source: General Plan EIR (Tables 3.15-9, 3.15-11, 3.15-13)

AWSC = All Way Stop Controlled

CMP = San Bernardino County Congestion Management Plan

¹ This intersection is assumed to be signalized in future scenarios

² Segment is within the "donut hole"

While the requirement for the maintenance of traffic levels of service "C" for all intersections would no longer apply within the TVPA, as shown in Table 4.2-2, buildout of the 2035 General Plan all intersections and roadways within the TVPA would operate at or better than LOS C. Additionally freeway segment # 54 would also operate at a LOS of C or better, and only freeway segment #55 would continue to operate at a LOS of E. The freeway system is not within the City's jurisdiction and impacts on the freeway system are related to regional growth that would occur regardless of the implementation of the 2035 General Plan. The General Plan EIR determined that impacts to this portion of the freeway would be significant and unavoidable. As the proposed Project does not change land use or density of that would change the buildout calculations of the 2035 General Plan, the impact analysis summary contained on page 3.15-33 of the

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General Plan EIR remains unchanged. Therefore, the proposed Project does not result in cumulatively considerable impacts beyond those evaluated in the General Plan EIR.